Written evidence submitted by Councillor Sharon Freeguard  
(PPW0007)

I write to address the following point:  
- The potential for new prisons in Wales

I am writing as a Labour Councillor on behalf of the Port Talbot Ward. I have lived in Port Talbot for 58 years and grew up on the Sandfields Estate in Aberavon. I have first hand knowledge of the site of the proposed prison on Baglan Moors, a site of bog and marsh, hence the name Baglan Moors.

Executive Summary

- The Baglan Moors site should not have been included on a list to the Ministry of Justice as a suitable site in the initial stage
- This site did not meet fundamental and crucial criterion to be on the list of proposed prison sites
- This site was classed as a C2 flood zone and prone to flooding, streets nearby flooded January 2018
- This site has a covenant restricting its use
- This site is within 1 mile radius of over 5000 school children and 11 schools
- MOJ consultants JBA and Natural Resource Wales held meetings and discussed this site in October 2016 when it was still designated as a C2 flood zone and with a covenant on the land
- Planning Policy Wales Technical Advice Note 15 (6.2) clearly states any new development should be directed away from flood zone C and towards suitable land in zone A, otherwise to zone B
- This proposed prison does not meet the future generations act of well being objectives
- Port Talbot has the second highest drug mortality rate in the UK and is one of the most deprived areas in Wales

1. There is a strong community feeling against this site of Baglan Moors being developed for a proposed prison. This site has always been prone to flooding and until February 2017 was designated as C2, defined in TAN15 as ‘used to indicate that only less vulnerable development should be considered subject to application of justification test, including acceptability of consequences. Emergency services and highly vulnerable development should not be considered’. In March 2017, NRW updated their development advice maps (which had previously been the responsibility of Welsh Government) to indicate that this land was now reclassified as C1. However, according to the TAN 15, new development should be directed away from zone C to zones A or B. The land in Baglan Moors from early ordinance survey maps show this land to be unstable.
2. It is concerning to see that this site was even considered and placed on the list of proposed prison sites as it was a designated a flood plain and had a covenant on the land. Consultants acting on behalf of the MOJ had been in discussion with NRW about this site as far back as October 2016 when it was C2 land.

The covenant on the land states that this land should be used for light industrial use and against any noisy or dangerous trade or occupation which may be a nuisance to the owners or occupiers of neighbouring premises.

3. At a Public Meeting a representative from the MOJ stated that it was an ideal site for prisoners to integrate into the community. The proposed prison will be a training facility and this will allow prisoners to be released into the community. This is alarming for residents and extremely worrying for parents as there is a super school just over 600 metres from the proposed prison site. A second super school (Welsh language) will be opened in 2018 within the same distance. There are 11 schools with 5065 children within a 1 mile radius of the proposed prison. Clearly, this has significant safeguarding issues and whilst this is not a planning consideration it should and must be a moral one, worthy of the strongest consideration.

There are significant concerns over the effect and impact that this facility would have on transport and the surrounding infrastructure as there are traffic issues at the moment. This extends to the social impact and in particular the drug related incidents in the local area. The proposed prison on this site would have a considerable and detrimental impact on the well being of residents, homes, business and school children. Increasing rainfall has already impacted on local streets where residents have experienced flooding and emergency resources had to be mobilised.

The site that is proposed is completely inappropriate both on a social and a topography level.

I would respectfully suggest that for information and validation that the Welsh Affairs Committee visit the site to see for themselves what a preposterous proposal this is when there are other sites with more suitable topography and fewer safeguarding issues that could be considered for a proposed prison in Wales.

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